



May 27, 2008

Honorable Edward S. Marion, Administrative Law Judge
Public Service Commission
P.O. Box 7854
Madison, WI 53707-7854

OFFICIAL FILING
SUBMITTED ELECTRONICALLY

Dear Judge Marion:

Enclosed is the Wisconsin's Paper Council's motion requesting full party intervenor status in Public Service Commission Docket 5-EI-145, captioned "Investigation to Explore the Potential for Geologic Carbon Sequestration for Carbon Dioxide Produced by Wisconsin's Electricity Generation Fleet."

Sincerely,

Earl Gustafson

Earl Gustafson
VP – Energy, Forestry & Human Resources

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Enc.

BEFORE THE
PUBLIC SERVICE COMMISSION
OF WISCONSIN

Investigation to Explore the Potential for Geologic Carbon]	
Sequestration for Carbon Dioxide Produced by Wisconsin's]	5-EI-145
Electricity Generation Fleet]	

Motion to Intervene
By The
Wisconsin Paper Council

The Wisconsin Paper Council moves to intervene as a full party in the above-captioned matter.

Service of Documents and Pleadings

Service of all subsequent documents and pleadings in this case should be submitted to:

Mr. Earl J. Gustafson
VP – Energy, Forestry & Human Resources
Wisconsin Paper Council
P.O. Box 718
250 North Green Bay Road (54956-2245)
Neenah, Wisconsin 54957-0718

Telephone: 920-722-1500
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E-Mail: gustafson@wipapercouncil.org

Interest of the Wisconsin Paper Council

- I. The Wisconsin Paper Council (WPC) is the trade association representing the pulp, paper and allied industry in the state. The WPC has been in existence for more than 57 years.
- II. The WPC is comprised of Regular members that are manufacturers of pulp, paper and paperboard products and Associate members supplying goods and services to the industry.

- III. All of the WPC's Regular and Associate members purchase retail electricity from regulated utilities in Wisconsin.
- IV. The paper industry purchases approximately 16.5 trillion British thermal units (BTU) of electricity annually. Individual paper companies purchase \$3.5 million to more than \$12.0 million of electricity annually. Electricity accounts for 15 percent to 20 percent of the average pulp and paper manufacturer's energy needs.
- V. The Wisconsin Public Service Commission's Notice of Investigation explains that the agency "intends to work with the Wisconsin Department of Natural Resources and others to investigate the economic, legal, geologic, and engineering implications of geologic carbon sequestration, and other related issues that may arise in the investigation."
- VI. The PSC's Notice of Investigation may reasonably be interpreted to indicate that the future costs of producing electricity in Wisconsin may be affected by the agency's findings, recommendations and/or order in this proceeding.
- VII. The PSC's Notice of Investigation may also reasonably be interpreted to indicate that the future costs of retail electricity purchased by the WPC's Regular and Associate members may be affected by this proceeding.
- VIII. The intervention and participation of the WPC will be in the public interest.
- IX. The WPC is not now, and will not be, adequately represented by any other party in this proceeding.

Therefore, pursuant to §227.44(2m), Wisconsin Statutes, and Chapter PSC 2.21(1), Wisconsin Administrative Rules, the Wisconsin Paper Council respectfully requests full-party intervenor status in the aforementioned proceeding as our direct and substantial interests, and those of our members, will be affected by any decision by the Public Service Commission.

Dated this 27th day of May, 2008.

Earl J. Gustafson

Earl J. Gustafson
VP – Energy, Forestry & Human Resources
Wisconsin Paper Council